



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**DATE:** MAY 08 2019  
**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Red Spot Paint and Varnish, Evansville, Indiana  
**FROM:** Jason Schenandoah, Environmental Engineer  
AECAB (IL/IN)  
**THRU:** Nathan Frank, Section Chief  
AECAB (IL/IN)  
**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Red Spot Paint and Varnish

**Facility Location:** 1107 East Louisiana St., Evansville, Indiana

**Date of Inspection:** March 29, 2019

**EPA Inspector(s):**

1. Jason Schenandoah, Environmental Engineer
2. Sarah Clark, Environmental Engineer

**Other Attendees**

1. Kevin Conkright, Corporate EHS Manager, Red Spot Paint and Varnish
2. Tim Tanner, VP of Legal Affairs and Strategic Planning, Red Spot Paint and Varnish
3. Jennifer Williams, Safety Supervisor, Red Spot Paint and Varnish
4. Daniel Roos, Air Compliance Manager, Indiana Department of Environmental Management

**Contact Email Address:** KDConkright@redspot.com

**Purpose of Inspection:** To ensure compliance with the Clean Air Act

**Facility Type:** Paint and coating manufacturer

**Arrival Time:** 8:15 am

**Departure Time:** 12:15 pm

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Red Spot Paint and Varnish (Red Spot) personnel unless otherwise noted.

**Process Description:**

Raw materials are brought in via truck. Bulk materials (liquid) are stored in storage tanks and other materials (liquid and solid) are stored in drums and bags. There are 3 production areas across the facility's campus: UV coating production; Lacquer/Varnish (clear coatings) production; and paint and non-clear coating (Main) production. The UV and clear coating production areas have the capability to produce larger sized batches: there is not much variability between products, so large batches can be produced. The main production building makes large batches, but also has the capability to produce smaller batches. Solids used in the Main production building are brought to milling stations to be broken down to the required consistency. Materials are then brought to mixing stations where employees will mix batches according to recipe and customer needs. Final product is stored in drums in a warehouse to await shipping.

**Staff Interview:** The facility is moving away from manufacturing coatings and paints that use Hazardous Air Pollutants (HAPs). The highest HAP emission is Toluene at about 1 ton per year. AP-42 is used to estimate mixing processes emission factors. Emissions from storage tanks are estimated using Tanks 4.09d.

**TOUR INFORMATION**

**EPA toured the facility:** Yes

**Data Collected and Observations:**

No VOC emissions were noted coming from the tanks in tank farms 1 and 2 while looking through a Forward Looking Infrared (FLIR) camera. No VOC emissions were noted coming from the waste storage containers in the waste storage area while looking through the FLIR camera. Some VOC emissions were noted coming from a container change (the contents of one damaged container was being poured into a new one) in the clear coating production building. In the Main building, we were informed that the ventilation ducts/tubing currently pull at approximately 40-50 feet per minute but that the facility would like to reach 100 feet per minute.

**Photos and/or Videos:** were taken during the inspection.


**Field Measurements:** were not taken during this inspection.

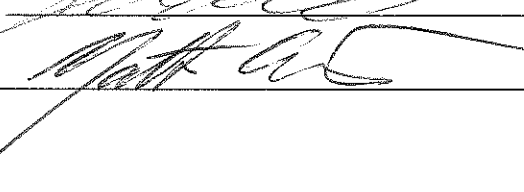
**CLOSING CONFERENCE**

**Requested documents:**

- Copy of most recent Title V air permit.

**SIGNATURES**

Report Author:  Date: 5/7/2019

Section Chief:  Date: 5/8/19

**Facility Name:** Red Spot Paint and Varnish

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**Date of Inspection:** March 29, 2019

**APPENDICES AND ATTACHMENTS**

*I.*      Appendix A: Digital Image Log

**Facility Name:** Red Spot Paint and Varnish

**Facility Location:** 1107 East Louisiana St., Evansville, Indiana

**Date of Inspection:** March 29, 2019

**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Jason Schenandoah (FLIR), Sarah Clark (Camera)	<b>2. Date(s) of Inspection:</b> March 29, 2019
<b>3. Company/Facility Name:</b> Red Spot Paint and Varnish	<b>4. Street Address, City, State:</b> 1107 East Louisiana St., Evansville, Indiana
<b>5. Number of Images:</b> 3	<b>6. Archival Record Location:</b> CD-R labeled as "Red Spot; Evansville, IN; Inspection Photos, FLIR; 3-29-2019"

Image Number	File Name	Date and Time (CDT)	Latitude and Longitude	Description of Image
1	P3290074.JPG	3/29/2019 10:22	37.986303, -87.547645	Storage tank farm 2 truck loading rack
2	P3290075.JPG	3/29/2019 10:24	37.986303, -87.547645	Storage tank farm 2
3	MOV_0036	3/29/2019 10:34		Video container changeout